

## **REMARKS**

In the Office Action, the Examiner rejected Claims 1, 3-7, 9-13 and 15-18 under 35 U.S.C. 102 as being fully anticipated by a document printed from a Web site and titled “Way Back Machine” (Collins). Also, Claims 1, 3-7, 9-13 and 15-21 were rejected under 35 U.S.C. 103 as being unpatentable over Collins in view of Official Notice and in view of Collins in view of a document from Imaging Portals (Portals).

Independent Claims 1, 7 and 13 are being amended to better define the subject matters of these claims. Claims 3-6, 9-12 and 15-18 are being cancelled to reduce the number of issues in this case, and Claim 19 is being cancelled because the limitations thereof are being added to Claims 1, 7 and 13. Claim 20 is being amended to be dependent from Claim 1 instead of the now cancelled Claim 19 and to take out limitations being added to Claim 1.

As amended herein, the application includes five claims – Claims 1, 7, 13, 20 and 21. Claims 1, 7 and 13 are independent claims, Claim 20 is dependent from Claim 1, and Claim 21 is dependent from Claim 20.

For the reasons advanced below, Claims 1, 7, 13, 20 and 21 patentably distinguish over the prior art and are allowable. The Examiner is thus asked to reconsider and to withdraw the rejections of Claims 1, 7 and 13 under 35 U.S.C. 102 and the rejections of Claims 1, 7, 13, 20 and 21 under 35 U.S.C. 103, and to allow Claims 1, 7, 13, 20 and 21.

Generally, Claims 1-20 patentably distinguish over the prior art because the prior art does not disclose or suggest the complete, comprehensive, and integrated Web based service management solution, including the predictive based repair service, described in independent Claims 1, 7 and 13.

The present invention addresses all of the needs of the service after sales. To achieve this comprehensive solution, a stream of information flows to and from a database, between a service provider and an equipment manufacturer, integrating back office and front office operations and web and wireless technology, and allowing total management over customer service.

The invention, by using this back-and-forth, interactive approach, achieves a number of important advantages. The invention helps the manufacturer increase service revenue, capture better customer and equipment history, improve turn around time, increase profitability, management of spare parts, warranty administration and customer satisfaction. In addition, the invention allows the service provider to obtain information such as service history, and account and billing information.

The Collins document is a Web page from a Web site. This Web site provides some information about servicing products, but it does not provide the same interactive access, via the Internet, with both the manufacturer and the manufacturer's database that the present invention does provide.

As it is believed the Examiner has recognized, there are a number of important features of the disclosed embodiment of the invention that are not shown in or rendered obvious by Collins.

One such important feature is the use of an interface with internet enabled equipment and appliances triggered by a repair event that enables an early warning system to offer predictive and need based repair service.

This feature was described in Claim 20, and in the Office Action, the Examiner cited the Portal document as disclosing predictive and need based repair service.

The reference from Imaging Portals, like Collins, discloses aspects of service. More specifically, the document from Imaging Portals discloses a network appliance that monitors and manages, among other matters, operating conditions of imaging and multifunction peripherals. This appliance allows copier and printer service organizations to directly monitor their install base through the Internet, allowing them to identify specifically what maintenance is required and when a service call should be scheduled in advance of equipment failure

The present invention is different in an important respect. With the instant invention, the interface with the internet enabled equipment and appliances enable, not just a service call, but actually provide predictive repairs service. With the Portal system, a service call can be scheduled in advance of equipment. With the present invention, an actual predictive repair service is provided.

Independent Claims 1, 7 and 13 are being amended to emphasize the integrated nature of the instant invention and also to describe the above-discussed predictive repair service that is provided by the present invention. Specifically, each of these claims is being amended to describe expressly the limitation of interfacing Internet enabled equipment and appliances triggered by a repair event to enable an early warning system to offer predictive and need based repair service.

The total management, including this predictive repair service that is provided by the present invention is of significant utility because, for example, it gives a service provider a comprehensive and complete, Web based solution that addresses all of the needs of the service after sales. In addition, the present invention may be used, as explained in detail in the present

application, to give a service provider with enterprise wide visibility to a continuous stream of data and information.


The other references of record have been reviewed, and these other references, whether they are considered individually or in combination, also do not disclose or render obvious this feature of the present invention.

In the Office Action, in discussing Official Notice, the Examiner argued that “it is old and well known to allow service departments, design departments and quality departments access to information obtained from the field so the data may be used to better design and improve products quality and increase customer satisfaction.” Independent Claims 1, 7 and 13, however, are not limited to “information from the field to improve product quality and customer satisfaction.” Instead, these claims set forth specific information, received in specific ways for specific purposes. In particular, the claims, as discussed above, include the limitation of “interfacing internet enabled equipment and appliances triggered by a repair event to enable an early warning system to offer predictive and need based repairs service.” This feature, in the contexts of Claims 1, 7 and 13, is not known.

In view of the above-discussed differences between Claims 1, 7 and 13 and the prior art, and because of the advantages associated with these differences, Claims 1, 7 and 13 patentably distinguish over the prior art and are allowable. Claims 20 and 21 are dependent from, and are allowable with, Claim 1. The Examiner is thus respectfully asked to reconsider and to withdraw the rejections of Claims 1, 7 and 13 under 35 U.S.C. 102 and the rejections of Claims 1, 7, 13, 20 and 21 under 35 U.S.C. 103, and to allow these claims.

For the reasons discussed above, the present application is in condition for allowance, a notice of which is requested. If the Examiner believes that a telephone conference with Applicant's Attorneys would be advantageous to the disposition of this case, the Examiner is asked to telephone the undersigned.

Respectfully submitted,

  
John S. Sensny  
Registration No. 28,757  
Attorney for Applicant

Scully, Scott, Murphy & Presser, P.C.  
400 Garden City Plaza - Suite 300  
Garden City, New York 11530  
(516) 742-4343

JSS:jy